

FEDERAL ELECTION COMMISSION

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OFFICE OF GENERAL COUNSEL

Bernard S. Dunstan, Jr.

Augusta, Georgia 30904

June 8, 2012

Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

In Re: Complaint No.: MUR #6576

Ladies and Gentlemen

Receipt is hereby acknowledged as of May 25, 2012, of the Notification of Complaint filed with the Federal Election Commission by Scott W. Paradise, Campaign Manager for Rick W. Allen for Congress, dated May 12, 2012. Violation #2 of the Complaint alleges excessive contributions to the Wright McLeod Campaign for Congress in the form of utilization of office space in a building owned by James Hull, Barry Storey, Margaret Dunstan and me.

Please be advised of the following pertinent facts regarding the subject office building:

- 1) The premises known as 3632 Wheeler Road, Augusta, Georgia, consist of approximately 7,000 square feet of professional office space formerly utilized as law offices (approximately 3,500 square feet) and offices for a real estate development company (balance of space).
- 2) The building has been vacant and actively marketed for sale or rent for the past four to five years.
- 3) As a condition of the McLeod Campaign's occupancy, it undertook the repair of the roof, the HVAC system, replacement of floor covering in the space to be utilized and payment of all utilities.
- 4) Should the Owners' procure a tenant, the McLeod Campaign must vacate upon sixty days notice.
- 5) Only a small portion of the building is being utilized by the McLeod Campaign.
- 6) Had Rick W. Allen first approached me for use of the building on similar terms, I would have agreed.

I have never met, been contacted by, nor communicated in any manner with Scott W. Paradise, Campaign Manager for R. W. Allen for Congress and Complainant in the captioned matter. I know Rick W. Allen by reputation only and if I have ever met him, I don't recall. I have met Wright McLeod once, and have spoken with him three times all in connection with the use of the office space.

I would suggest to the Federal Election Commission that the alleged Violation #2 of the Complaint is factually inaccurate, a "cheap political ploy" and certainly an indication of Mr. Allen's failure to manage the public actions of an inept political subordinate to whom he has entrusted the management of his congressional campaign. Should Mr. Allen be successful in his congressional campaign, I sincerely hope that the complaint does not indicate his perception of how to wisely and properly spend our federal tax dollars.

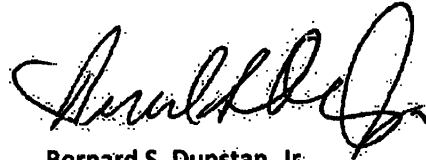
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The Commission's Notification of May 22, 2012, indicates that pursuant to 2. U. S. C. §437g (a)(4)(B) and §437g (a)(12)(A), unless I give the Commission written authorization to make public the allegations against me, the allegation is to remain confidential. Please be advised that the Rick W. Allen Campaign for Congress and Scott W. Paradise as its Campaign Manager have reported the filing of the Complaint against me and the other owners to local TV stations (Channel 26, NBC affiliate), radio stations (WGAC) and local news media (The Augusta Chronicle), all of which have aired and reported the story extensively. Accordingly, let this Response serve as my reservation of the right to file at a future date a Complaint against R. W. Allen and Scott W. Paradise for violation of my confidentiality rights as afforded me pursuant to the federal statutes herein cited. Unlike R. W. Allen and Scott W. Paradise, I will not make public my Complaint against them.

Lastly, I would like to incorporate into my Response the Response of my co-owner, James M. Hull (dated 5/31/2012, copy attached). Mr. Hull's Response contains an extensive analysis of the factors to be utilized in determining "Market Value" of similar real estate.

In summary, I am thoroughly disgusted with the entire electoral process.



Bernard S. Dunstan, Jr.

Cc: James Hull  
Margaret Dunstan  
Barry Storey  
R. W. Allen  
Scott W. Paradise

Enclosure